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September 13, 2023

VIA ELECTRONIC CASE FILING

MEMO ENDORSED

Hon. Jessica G.L. Clarke
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Ingram v. International Asbestos Removal, Inc., et al.
Case No.: 22-cv-10149 (JGLC)

Your Honor:

This firm serves as counsel to Defendants in the above-referenced matter. We write in accordance with Your Honor's Individual Rules to respectfully request an adjournment of the upcoming conference scheduled for September 25, 2023. The adjournment is necessary because the undersigned will be unable to attend due to observance of Yom Kippur. I am aware that my presence is required in accordance with Rule 3(f) of Your Honor's Individual Rules of Practice.

This is the second request to adjourn the upcoming conference as it was previously scheduled for August 31, 2023. I am aware that September 25, 2023 was a date recommended by Mr. Eden in our prior application dated August 23, 2023. At the time the request was made, we had overlooked that Yom Kippur was on September 25, 2023 as the holiday is not designated in our case management calendar. However, we have now just realized the conflict which will prevent me from attending the conference. Accordingly, we submit this second request to adjourn and apologize for any inconvenience caused.

We have conferred with Plaintiff's Counsel, The Law Offices of Barbara Meister Cummins, who advises that Plaintiff consents to an adjournment in September but does not consent to an adjournment in October. We have also conferred with Plaintiff's counsel on mutual availability. Notwithstanding Plaintiff's objection to adjourning the conference into October, the Parties three earliest dates of mutual availability are September 29, 2023, October 11, 2023, and October 12,



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2023.

We thank the Court for its time and attention to this matter. We remain available should the Court require additional information in connection with this submission.

Respectfully submitted,

ZABELL & COLLOTTA, P.C.

/s/ *Saul D. Zabell*

Saul D. Zabell

cc: Client

Application GRANTED. The status conference is hereby RESCHEDULED for **September 29, 2023 at 12:00 p.m.** in Courtroom 20C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jessica Clarke'.

JESSICA G. L. CLARKE
United States District Judge

Dated: September 14, 2023
New York, New York